

Appendix A

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-010	AA-NEA-00070353	AA-NEA-00070357	Document titled "[Customer] Overview - March 2019"	American moves to redact from this summary document, which details the terms and strategy with respect to one of its key customers, the customer name, targeted discounting strategy and pricing terms, and other granular financial data that is competitively sensitive.	As explained in Section II.D. of the Motion, customer names and specific pricing and discounting terms relevant to the customer if disclosed would harm American's competitive standing by enabling competitors to target American's key customer using the information contained in the exhibit. The customer also has a privacy interest against disclosure in this trial.	Historic; Overredacted. The document from March 2019 relates to the performance of a corporate customer contract. Plaintiffs do not object to redacting the customer name, but oppose Defendants' other redactions.
DX-075	AA-NEA-02294080	AA-NEA-02294080	Document titled 2021 NEA Transfer Payment dated December 17, 2021	American moves to seal this exhibit in its entirety. The exhibit is titled "NEA Growth and 2021 Incremental Revenue and Transfer Payment" and contains detailed analysis of American's and JetBlue's confidential and competitively sensitive revenue data in 2021 using accounting methods that are proprietary and competitively sensitive.	As explained in Section II.C of the Motion, disclosure of granular financial data will harm American's competitive standing. The exhibit provides detailed accounting of American's and JetBlue's revenue data from 2019 and also in 2021, which if disclosed to competitors would help inform their competitive decision-making in the Northeast.	Core to the NEA; Historic; Overredacted. This document describes a 2021 payment between Defendants pursuant to the MGIA. Defendants propose sealing this document entirely, and have not provided more narrow redactions despite Plaintiffs' requests.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-084	AA-NEA-02981647	AA-NEA-02468027	Network Strategy Board Meeting Presentation, dated July 27, 2021	American moves to redact portions of this exhibit, which is a Board deck from July 2021 spanning 100 pages that was used by the company to explain to the Board in detail American's future commercial strategy. Despite its sensitivity, American does not move to redact specific discussions of the Northeast Alliance and American's strategy with respect to New York and Boston. However, American moves to redact from this presentation the most sensitive portions that reveal granular and competitively sensitive financial data including yield and profitability data broken out by types of routes that inform how American makes future capacity decisions, revenue data specific to American's partnerships and highly sensitive future strategy and network plans, including detailed analyses of network plans by airport, and future plans with respect to existing or potential partnerships.	As explained in Section II.A. and II.C. of the Motion, disclosure of competitively sensitive business information regarding American's future plans and granular financial data will harm American's competitive standing.	Core to the NEA; High-level; Historic; Overredacted. This July 2021 strategy deck includes high-level discussions about Defendants' inorganic growth resulting from the NEA.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-089	AA-NEA-02981647	AA-NEA-02981750	Network Strategy July Board Meeting, dated July 2021	American moves to redact portions of this exhibit, which is a Board deck from July 2021 spanning 100 pages that was used by the company to explain to the Board in detail American's future commercial strategy. Despite its sensitivity, American does not move to redact specific discussions of the Northeast Alliance and American's strategy with respect to New York and Boston. However, American moves to redact from this presentation the most sensitive portions that reveal granular and competitively sensitive financial data including yield and profitability data broken out by types of routes that inform how American makes future capacity decisions, revenue data specific to American's partnerships and highly sensitive future strategy and network plans, including detailed analyses of network plans by airport, and future plans with respect to existing or potential partnerships.	As explained in Section II.A. and II.C. of the Motion, disclosure of competitively sensitive business information regarding American's future plans and granular financial data will harm American's competitive standing.	Core to the NEA; High-level; Historic; Overredacted. This July 2021 strategy deck, similar to DX-084, includes high-level discussions about Defendants' inorganic growth resulting from the NEA.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-093	AA-NEA-03103322	AA-NEA-03103351	Mutual Growth Incentive Agreement between American Airlines and JetBlue Airways, dated July 15, 2020	American moves to redact portions of this exhibit, which is the agreement between American and JetBlue within the Northeast Alliance that governs the revenue sharing formula. American recognizes the highly relevant nature of this document and proposes only a few targeted redactions. These include: (1) discussions of contingencies regarding potential changes to the scope of partnership that is not currently contemplated by the NEA; (2) specific math formula regarding how to make adjustments regarding flight capacity for the purposes of the MGIA calculation; (3) threshold amount for an accounting one-off item; and (4) a worked example of the MGIA calculation that provides detailed demonstration of all of the different elements of the MGIA formula. American does not oppose Parties' experts developing their own examples of MGIA calculations based on all of the different elements of the MGIA. American does not propose to seal, but considers this worked example to be proprietary.	As explained in Section II.F. of the Motion, the very targeted redactions cover only a few terms that Defendants do not view as relevant or necessary to the issues at trial and are competitively sensitive.	Core to the NEA. Plaintiffs oppose redacting Appendix E of the Mutual Growth Incentive Agreement (MGIA) (DX-093). This describes a hypothetical (not based on actual party data) and therefore not competitively sensitive. Defendants have also not redacted the MGIA formula of which the hypothetical example might reveal details.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-111	AA-NEA-03192426	AA-NEA-03192469	American's internal presentation titled "2021-2026 Network Five Year Plan" dated Aug. 26, 2021	American moves to seal this exhibit in its entirety. The exhibit is a five-year long-range network strategy plan for American Airlines. American moves to redact parts of American's long-range network plan from 2021 that discuss American's long-term strategy, reference specific departure or other capacity decisions that American plans to make in 2022 and beyond, and granular profitability data associated with specific routes or airports. American does not move to seal general discussions of American's past strategy or general discussions of American's future strategy with respect to New York, Boston, and Philadelphia.	The proposed redactions contain highly sensitive future network plans that if disclosed to competitors would harm American's competitive standing by allowing competitors to plan their own network with an understanding of American's future strategy. The proposed redactions also contain highly sensitive profitability data that if disclosed to competitors would allow competitors to make competitive decisions on targeting growth armed with knowledge regarding where American is weak or strong. Finally, American's redactions are targeted - American does not propose to seal relevant information that discuss background and high-level strategy that pertain to New York, Boston, and Philadelphia.	High-level; Historic; Overredacted. This document is a five-year network plan. It includes high-level, non-specific plans as well as historic information.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-115	AA-NEA-03276774	AA-NEA-03276790	Bilateral Special Prorate Agreement - Passenger between American Airlines and JetBlue Airways, dated August 6, 2020	American moves to seal the exhibit in its entirety. The exhibit is an agreement between American and JetBlue that details the technicalities of how American and JetBlue will implement the Codeshare Agreement regarding service charges, surcharges, fare rules, proration of codeshare commission, and other fees.	As explained in Section II.F. of the Motion, Defendants do not view this agreement as relevant or necessary to the issues at trial and view the agreement as competitively sensitive.	Core to the NEA. This document is the Prorate Agreement between Defendants, which directly relates to their contractual relationship. Defendants propose sealing this document entirely, and have not provided more narrow redactions despite Plaintiffs' requests.
DX-127	AA-NEA-03293988	AA-NEA-03294007	B6 AA Bilateral Special Prorate Agreement - Passenger, Revision 4, dated November 2, 2021	American moves to seal the exhibit in its entirety. The exhibit is an agreement between American and JetBlue that details the technicalities of how American and JetBlue will implement the Codeshare Agreement regarding service charges, surcharges, fare rules, proration of codeshare commission, other fees.	As explained in Section II.F. of the Motion, Defendants do not view this agreement as relevant or necessary to the issues at trial and view the agreement as competitively sensitive.	Core to the NEA. This document is the Prorate Agreement between Defendants, which directly relates to their contractual relationship. Defendants propose sealing this document entirely, and have not provided more narrow redactions despite Plaintiffs' requests.
DX-199	AA-NEA-03325598	AA-NEA-03325619	JetBlue/American Northeast Alliance Presentation by JetBlue to State Attorney Generals, dated February 2021	JetBlue moves to redact parts of this Northeast Alliance presentation to State Attorney Generals that discuss non-stale competitively sensitive information concerning JetBlue's network growth strategy in New York, Boston, California, Florida, Texas, and Washington, D.C. JetBlue does not move to seal other pertinent information regarding the NEA.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing.	Core to the NEA; Overredacted; Publicly available. This February 2021 slide deck describes components of the NEA, some of which have since been publicly announced or disclosed.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-202	AA-NEA-03325626	AA-NEA-03325651	JetBlue's 2020 Strategic Network Discussion presentation regarding Connie/E190 implications on future size & shape	JetBlue moves to redact parts of JetBlue's network plan that discuss JetBlue's future capacity, fleet strategy, and granular financial data. JetBlue does not move to seal general discussions of JetBlue's past strategy.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Core to the NEA; Overredacted; Publicly available. This July 2021 slide deck relates to which markets American will fly under the NEA, and which markets JetBlue will fly under the NEA. Some of these decisions have since been publicly announced.
DX-266	JBLU00026807	JBLU00026832	JetBlue's May 2020 Strategic Network Discussion presentation regarding Connie/E190 implications on future size & shape	JetBlue moves to redact parts of JetBlue's network plan that discuss JetBlue's future capacity, fleet strategy, and granular financial data. JetBlue does not move to seal general discussions of JetBlue's past strategy.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Core to the NEA; High-level; Historical. This document is a Spring 2020 (used internally and sent to the U.S. Department of Transportation) deck related to NEA projections through October 2022. It discusses fleet allocation and network implications critical to assessment of the NEA. Redacted information relates to publicly announced or disclosed network changes.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-271	JBLU00040919	JBLU00040935	JetBlue's May 2020 "Project Connie Update" Network Planning presentation	JetBlue moves to redact parts of JetBlue's network plan that discuss JetBlue's future strategy associated with specific airports and granular financial data. JetBlue does not move to seal general discussions of JetBlue's past strategy.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Core to the NEA; Overredacted. This slide deck relates to Defendants' understand of the NEA. Plaintiffs agree to redact certain margin percentages, but oppose Defendants' other redactions.
DX-283	JBLU00484892	JBLU00484916	JetBlue's July 18, 2017 Executive Crew Discussion presentation on initiatives related to a specific project launched in response to a competitor's growth in Boston	JetBlue moves to redact parts of JetBlue's strategic plans and granular financial data. JetBlue does not move to seal general discussions of JetBlue's past strategy.	As explained in Section II.A. of the motion, disclosure of strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition; Publicly available. This is a deck from July 2017 related to JetBlue's pre-NEA network plans. Those plans have been publicly announced or rendered moot by the NEA.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-290	JBLU00679360	JBLU00679391	JetBlue's January 11, 2019 Working Team Meeting presentation related to a specific project launched in response to a competitor's growth in Boston	JetBlue moves to redact parts of JetBlue's strategic plans and granular financial data. JetBlue does not move to seal general discussions of JetBlue's past strategy.	As explained in Section II.A. of the motion, disclosure of strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition; Publicly available. This is a deck from January 2019, including information that relates to 2019 plans, discusses high-level plans, and reflects historic data.
DX-310	JBLU01471771	JBLU01471787	JetBlue's February 22, 2019 presentation for corporate sales on Boston growth plan initiative for corporate sales regarding initiatives related to a specific project launched in response to a competitor's growth in Boston	JetBlue moves to redact parts of JetBlue's network planning and corporate strategy.	As explained in Section II.A. of the motion, disclosure of strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition; Publicly available. This is a deck from February 2019, including information that relates to 2019 plans, discusses high-level plans, and reflects historic data. Plaintiffs do not object to redacting corporate customer names, but oppose Defendants' other redactions.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-313	JBLU016 90326	JBLU016 90357	JetBlue's January 11, 2019 Working Team Meeting presentation related to a specific project launched in response to a competitor's growth in Boston	JetBlue moves to redact parts of JetBlue's strategic plans and granular financial data. JetBlue does not move to seal general discussions of JetBlue's past strategy.	As explained in Section II.A. of the motion, disclosure of strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. This is a deck from January 2019 related to JetBlue's pre-NEA network plans. Those plans have been publicly announced or rendered moot by the NEA. The data on which the deck is based is from 2015 - 2018.
DX-315	JBLU019 68933	JBLU019 68936	JetBlue's ticket data for each domestic ticket sold between January 1, 2017 and July 1, 2020	JetBlue moves to seal this exhibit. The exhibit is JetBlue's raw ticket sales data for each domestic ticket sold between January 1, 2017 and July 1, 2020.	This spreadsheet provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's domestic customers and how to undercut JetBlue's pricing strategy. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Historic; Overredacted. Defendants propose sealing this in its entirety and have not offered proposed redactions despite Plaintiffs' requests.
DX-323	JBLU026 15251	JBLU026 15255	May 2020 email thread among Friedman, Lusso, and Laurence re: Connie concerns	JetBlue moves to redact information regarding proprietary route planning analyses. JetBlue does not move to seal other pertinent information regarding the NEA.	As explained in Section II.A. of the motion, disclosure of non-stale competitively sensitive corporate strategy information will harm JetBlue's competitive standing.	Core to the NEA; Overredacted. This document reflects Defendants' proposals to one another during NEA negotiations relates to slot utilization and market allocation under the NEA.

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DX-327	JBLU026 27810	JBLU026 27810	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-328	JBLU026 27811	JBLU026 27811	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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DX-329	JBLU026 27812	JBLU026 27812	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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DX-330	JBLU026 27813	JBLU026 27813	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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DX-332	JBLU026 27815	JBLU026 27815	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-333	JBLU026 27816	JBLU026 27816	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-335	JBLU026 27818	JBLU026 27818	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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DX-338	JBLU026 27821	JBLU026 27821	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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DX-340	JBLU026 27823	JBLU026 27823	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>
DX-341	JBLU026 27824	JBLU026 27824	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	

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DX-344	JBLU026 27827	JBLU026 27827	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

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DX-345	JBLU026 27828	JBLU026 27828	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-346	JBLU026 27829	JBLU026 27829	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-347	JBLU026 27830	JBLU026 27830	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-348	JBLU026 27831	JBLU026 27831	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-350	JBLU026 27833	JBLU026 27833	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-353	JBLU026 27836	JBLU026 27836	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	<p>As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy.</p> <p>As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.</p>	<p>Core the the NEA; Employee discourse; High-level.</p> <p>This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.</p>

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-354	JBLU026 27837	JBLU026 27837	Text message thread between Robin Hayes and Scott Laurence, dated April 7, 2020	JetBlue moves redact personal phone numbers and parts of this April 2020 text message thread between Robin Hayes and Scott Laurence that discuss JetBlue's future fleet strategy, including unrealized future network growth strategy.	As explained in Section I.A. of the motion, personal phone numbers should be sealed in the interest of privacy. As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.	Core the the NEA; Employee discourse; High-level. This is part of a single text conversation between JetBlue's CEO and Head of Revenue in April 2020 during NEA negotiations and discussing the potential effect of the NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented. Plaintiffs do oppose Defendants' other redactions.
DX-358	JBLU027 29501	JBLU027 29503	JetBlue internal memorandum outlining the internal NEA economics and network planning model, dated June 1, 2020	JetBlue moves to seal this June 1, 2020 internal memorandum that discusses JetBlue's future fleet strategy.	As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, will harm JetBlue's competitive standing.	Core to the NEA; High-Level; Overredacted. This is a high-level summary of the NEA for JetBlue executives regarding modeling assumptions and planned network changes. Plaintiffs do not oppose redacting specific forward-looking forecast numbers or unannounced routes, but Plaintiffs do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-382	JBLU-LIT-02003588	JBLU-LIT-02003591	Email thread from Nirav Virani to the JetBlue SLT regarding the FY 22 GSA City Pair Program Overview, September 27, 2021	JetBlue moves to seal this September 27, 2021 email that discusses non-stale competitively sensitive information regarding JetBlue's network strategy and bidding tactics, as well as granular financial data.	As explained in Section II.A. and II.C. of the Motion, disclosure of future plans and granular financial data will harm JetBlue's competitive standing.	High-level; Publicly available. This document relates to JetBlue's government travel contract bidding process for fiscal year 2023. The redacted portions contain publicly available information (https://cpsearch.fas.gsa.gov/cpsearch/search.do) regarding government travel contract awards. Plaintiffs do not object to redacting specific current bidding strategies and non-public bid information, but do oppose sealing the document in its entirety. Defendants have not offered proposed redactions despite Plaintiffs' requests.
DX-385	JBLU-LIT-02343258	JBLU-LIT-02343261	Email thread from Barry McMenamin to Jeremy Blechman, Nicholas Esparza, and Robbie Mehoke regarding Jetblue's final proposal to a corporate customer from December 2021	JetBlue moves to redact from this email thread regarding JetBlue's proposal to a corporate customer the name of the corporate customer and the pricing terms offered to the customer. JetBlue does not seal other pertinent information regarding the terms of the offer to the corporate customer.	As explained in Section i.B. of the Motion, certain corporate customer names should be sealed in the interest of privacy. As explained in Section II.D. of the Motion, specific pricing terms if disclosed will harm JetBlue's competitive standing.	Overredacted. Plaintiffs do not oppose Defendants' proposed redactions of customer names/abbreviations and employee identifications, but do oppose redactions of the specific pricing figures being discussed.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-386	JBLU-LIT-02357567	JBLU-LIT-02357569	Email chain between Barry McMenamin, Robbie Mehoke, Gregory Royall, and Ruth Medina regarding BOS-DCA pricing for numerous corporate customers from October 2021	JetBlue moves to redact from this email regarding BOS-DCA pricing for numerous corporate customers. JetBlue does not seal other pertinent information regarding the terms of the offer to the corporate customers.	As explained in Section i.B. of the Motion, certain corporate customer names should be sealed in the interest of privacy. As explained in Section II.D. of the Motion, specific pricing terms if disclosed will harm JetBlue's competitive standing.	Overredacted. Plaintiffs do not oppose Defendants' proposed redactions of customer names/abbreviations and employee identifications, but do oppose redactions of the specific pricing figures being discussed.
DX-395	JBLU-LIT-02827598	JBLU-LIT-02827642	JetBlue Quarterly Network Review slide deck, dated April 25, 2017	JetBlue moves to redact information regarding granular profitability information, granular margin information and future network planning in Boston, Florida, New York, and the Transcontinental market. JetBlue does not move to seal other pertinent information regarding the NEA.	As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document is from April 2017. Defendants have not articulated to Plaintiffs what is competitively sensitive about information contained therein.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-458	JBLU-LIT-04434165	JBLU-LIT-04434166	Email from Nirav Virani to Jonathan Weiner and Evan Jarashow regarding "JetBlue GSA FY23 Performance Summary," dated July 22, 2022	JetBlue moves to redact the portions of this email containing non-stale competitively sensitive information regarding JetBlue's network growth strategy and bidding tactics, granular financial data related to JetBlue's business with GSA, and JetBlue's pricing strategy with respect to the GSA City Pair Program.	As explained in Section II.A., II.C, and II.D. of the Motion, disclosure of highly sensitive, non-public strategic planning documents, granular financial data, and specific pricing terms will harm JetBlue's competitive standing.	Publicly available. This July 2022 document relates to JetBlue's government travel contract bidding process for fiscal year 2023. The redacted portions contain publicly available information (https://cpsearch.fas.gsa.gov/cpsearch/search.do) regarding government travel contract awards. Plaintiffs do not object to redacting specific current bidding strategies and non-public bid information. Plaintiffs do oppose redacting contract awards outcomes and statements describing other airlines' results.
DX-814			Exhibit 2 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized frequent flyer ticket data from 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-815			Exhibit 3 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
DX-816			Exhibit 4 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a table indicating where American and JetBlue customers reside.	This table provides competitors an understanding of where marketing could be targeted to capture more of American and JetBlue customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue and American ticket data from 2019.
DX-817			Exhibit 5 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-818			Exhibit 6 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
DX-819			Exhibit 7 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a table indicating where American and JetBlue customers reside.	This table provides competitors an understanding of where marketing could be targeted to capture more of American and JetBlue customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
DX-821			Exhibit 9 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue and American ticket data from 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-822			Exhibit 10 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue and American ticket data from 2019.
DX-823			Exhibit 11 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a table indicating where American and JetBlue customers reside.	This table provides competitors an understanding of where marketing could be targeted to capture more of American and JetBlue customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue and American ticket data from 2019.
DX-824			Exhibit 12 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. This exhibit is a map of where Jetblue's customers reside created using JetBlue's ticket sales data from the JetBlue slide deck "New York & Washington DC Slot Acquisition Plan," dated January 2012	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized ticket data from 2012.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-832			Exhibit 20 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. This exhibit is a table showing granular financial information concerning JetBlue's corporate strategy in certain domestic markets.	As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public information concerning JetBlue's corporate strategy will harm JetBlue's competitive standing.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.
DX-845			Exhibit 33 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
DX-846			Exhibit 34 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-847			Exhibit 35 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
DX-848			Exhibit 36 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
DX-849			Exhibit 37 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-850			Exhibit 38 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
DX-890			Exhibit 35 of D. Lee Expert Report (July 11, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's and JetBlue's customers reside using Defendants' frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's and JetBlue's customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.
DX-891			Exhibit 36 of D. Lee Expert Report (July 11, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's and JetBlue's customers reside using Defendants' frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's and JetBlue's customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-892			Exhibit 37 of D. Lee Expert Report (July 11, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.
DX-893			Exhibit 38 of D. Lee Expert Report (July 11, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized catchment data.
DX-894			Exhibit 39 of D. Lee Expert Report (July 11, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's and JetBlue's customers reside using Defendants' frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's and JetBlue's customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
DX-910			Exhibit 55 of D. Lee Expert Report (July 11, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's and JetBlue's customers reside using Defendants' frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's and JetBlue's customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0001 -b	N/A	N/A	"Mutual Growth Incentive Agreement between American Airlines, Inc. and JetBlue Airways Corporation" - Execution Version	American moves to redact portions of this exhibit, which is the agreement between American and JetBlue within the Northeast Alliance that governs the revenue sharing formula. American recognizes the highly relevant nature of this document and proposes only a few targeted redactions. These include: (1) discussions of contingencies regarding potential changes to the scope of partnership that is not currently contemplated by the NEA; (2) specific math formula regarding how to make adjustments regarding flight capacity for the purposes of the MGIA calculation; (3) threshold amount for an accounting one-off item; and (4) a worked example of the MGIA calculation that provides detailed demonstration of all of the different elements of the MGIA formula. American does not oppose Parties' experts developing their own examples of MGIA calculations based on all of the different elements of the MGIA. American does not propose to seal, but considers this worked example to be proprietary.	As explained in Section II.F. of the Motion, the very targeted redactions cover only a few terms that Defendants do not view as relevant or necessary to the issues at trial and are competitively sensitive.	Core to the NEA. Plaintiffs oppose redacting Appendix E of the Mutual Growth Incentive Agreement (MGIA) (DX-093). This describes a hypothetical (not based on actual party data) and therefore not competitively sensitive. Defendants have also not redacted the MGIA formula of which the hypothetical example might reveal details.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0197	AA-NEA-00594230	AA-NEA-00594234	Email thread between Wim Reckelbus, Paul Swartz, Marco Pena, Ricki Reichard, Julie Bass, Eleni Karandreas, and Brenda Whalen from June 2019 re: customer for shuttle approval	American moves to redact parts of this email communication that identify a corporate customer and discuss specific pricing terms and targeted bidding strategies for that corporate customer.	As explained in Section II.D of the Motion, disclosure of corporate customer names and specific pricing terms and targeted bidding strategies for that corporate customer will harm American's competitive standing. The customer also has a privacy interest against disclosure in this trial.	Historic; Overredacted; Pre-NEA competition. The document shows the impact of Boston competition on Boston-area sales agreement. Redacting the customer name is acceptable.
PX0199	AA-NEA-00594318	AA-NEA-00594323	Email thread between Cory Heckman, Wim Reckelbus, Gabriela Sposito, Joann Riedel, Paul Swartz, BJ Hemeng Jr., Robert Happenstall, Ricki Reichard, and Brenda Whalen from March - September 2018 re: customer Mgmt round 1 feedback. Final due Oct 1st - shuttle	American moves to redact parts of this email communication that identify a corporate customer and discuss specific pricing terms and targeted bidding strategies for that corporate customer.	As explained in Section II.D of the Motion, disclosure of corporate customer names and specific pricing terms and targeted bidding strategies for that corporate customer will harm American's competitive standing. The customer also has a privacy interest against disclosure in this trial.	Historic; Overredacted; Pre-NEA competition. The document shows the impact of Boston competition on Boston-area sales agreement. Redacting the customer name is acceptable.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0200	AA-NEA-00594475	AA-NEA-00594477	Email thread between CRM System User, Ricki Reichard, and Paul Swartz from April 2019 re: Approval Request for ROW Deal - ROW-customer; contains one attachment titled "Approval Request for customer ROW"	American moves to redact certain parts of this email communication that identify a corporate customer and discuss specific pricing terms and targeted bidding strategies for a specific corporate customer.	As explained in Section II.D of the Motion, disclosure of corporate customer names and specific pricing terms and targeted bidding strategies for that corporate customer will harm American's competitive standing. The customer also has a privacy interest against disclosure in this trial.	Historic; Overredacted; Pre-NEA competition. The document shows competition between JetBlue and American, including the impact of Boston competition on Boston-area sales agreement. Redacting the customer name is acceptable.
PX0216	AA-NEA-00614771	AA-NEA-00614775	Email thread between Richard Sien, Erik Anton, Allysen Roberts, and Allie Plunk from March 2020 re: Spread B6 Sale	American moves to seal this email chain, which is a discussion among employees in the pricing department of American regarding how to execute a specific pricing strategy in the context of certain market conditions.	As explained in Section II.B. of the Motion, disclosure of pricing strategy will harm American's competitive standing.	Historic; Overredacted; Pre-NEA competition. The document shows competition between JetBlue and American. Plaintiffs agree to redact non-NEA routes.
PX0289	AA-NEA-01524104	AA-NEA-01524111	Email thread between James Kaleigh, Chad Schweinzger, Jordan Pack, Matthew McElfresh, Anmol Bhargava, Massimo Mancini, Farrell Malone, Gustavo Bamberger, Maya Meidan, and Jataveda Dasgupta from May 2020 re: Scenario 4 Updates - Privileged and Confidential	American moves to redact competitively sensitive business information regarding certain features of American's proprietary Raven tool.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing.	Core to the NEA. Redactions concern key calculations of revenue expected from NEA.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0294	AA-NEA-01524750	AA-NEA-01524759	Email thread between Chad Schweinzger, Matthew McElfresh, Jordan Pack, Bruce Wark, James Kaleigh, Farrell Malone, and Anmol Bhargava from April 2020 re: Garland Initial Raven Results-Privileged and Confidential	American moves to redact competitively sensitive business information regarding certain features of American's proprietary Raven tool.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing.	Core to the NEA. Redactions concern key calculations of revenue expected from NEA.
PX0295	AA-NEA-01524776	AA-NEA-01524786	Email thread between Chad Schweinzger, Matthew McElfresh, Jordan Pack, Bruce Wark, James Kaleigh, Farrell Malone, and Anmol Bhargava from April 2020 re: Garland Initial Raven Results - Privileged and Confidential	American moves to redact competitively sensitive business information regarding certain features of American's proprietary Raven tool.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing.	Core to the NEA. Redactions concern key calculations of revenue expected from NEA.
PX0296	AA-NEA-01524788	AA-NEA-01524796	Email thread between Matthew McElfresh, Anmol Bhargava, Chad Schweinzger, Bruce Wark, James Kaleigh, Malone Farrell, and Jordan Pack from April 2020 re: Garland Initial Raven Results - Privileged and Confidential	American moves to redact competitively sensitive business information regarding certain features of American's proprietary Raven tool.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing.	Core to the NEA. Redactions concern key calculations of revenue expected from NEA.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0314	AA-NEA-01830184	AA-NEA-01830297	Email from Ronald Defeo to "DL_AA_OFFICERS" list serv from July 2021 re: Board Decks; contains two attachments titled "20210724 July Board Meeting_pread_vFF.pdf" and "20210724_BOD_Executive Summarties_vFF.pdf"	American moves to redact portions of this exhibit, which is a Board deck from July 2021 spanning 100 pages that was used by the company to explain to the Board in detail American's future commercial strategy. Despite its sensitivity, American does not move to redact specific discussions of the Northeast Alliance and American's strategy with respect to New York and Boston. However, American moves to redact from this presentation the most sensitive portions that reveal granular and competitively sensitive financial data including yield and profitability data broken out by types of routes that inform how American makes future capacity decisions, revenue data specific to American's partnerships and highly sensitive future strategy and network plans, including detailed analyses of network plans by airport, and future plans with respect to existing or potential partnerships.	As explained in Section II.A. and II.C. of the Motion, disclosure of competitively sensitive business information regarding American's future plans and granular financial data will harm American's competitive standing.	High-level; Historic. This email from July 2021 relates to high-level strategies and historical descriptions of markets, such as passenger breakdowns from 2019. Plaintiffs do not object to redactions of specific margin percentages, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0358	AA-NEA-02832323		Standalone American Airlines spread sheet from January 2021 titled "NEA MGIA Model"; contains 47 tabs.	American moves to seal the exhibit in its entirety. The spreadsheet is an excel file that includes revenue sharing calculation in the NEA that apply highly sensitive revenue data from American and JetBlue and reveal exactly how those revenue data is imputed, analyzed, and calculated for the purpose of the revenue sharing in the MGIA.	As explained in Section II.C. of the Motion, disclosure of American and JetBlue revenue data will harm American's competitive standing. Additionally, as explained in Section II.E. of the Motion, disclosure of this detailed spreadsheet that reveals exactly how American analyzes revenue data for the purpose of revenue sharing reveals proprietary and non-public business information that will harm American's competitive standing.	Core to the NEA. The Mutual Growth Incentive Agreement is a central component of the NEA.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0363	AA-NEA-02937201	AA-NEA-02937226	Standalone American Airlines slide deck from April 2021 titled "Domestic Partnerships and RM"	American moves to redact from this exhibit, titled "Domestic Partnerships and RM," information regarding American's non-stale and competitively sensitive future network plans, partnership plans, and pricing strategies for specific routes.	As explained in Sections II.A and B of the Motion, disclosure of future plans and pricing strategies will harm American's competitive standing.	Core to the NEA; High-level; Overredacted. This is a high-level deck on American's airline partnerships, and includes a summary of why American enters those partnerships. It also contains a description of the NEA. Plaintiffs do not oppose redacting specific pricing strategies (although matching fares of the operating airline on codeshare routes is standard industry practice).

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0370	AA-NEA-03097838	AA-NEA-03097938	Email thread between Massimo Mancini and Vasu Raja from August 2021 re: BoD PPT; contains one attachment titled "2Q21 BOD (7.27.21) - Presentation Deck.pptx"	American moves to redact portions of this exhibit, which is a Board deck from July 2021 spanning 100 pages that was used by the company to explain to the Board in detail American's future commercial strategy. Despite its sensitivity, American does not move to redact specific discussions of the Northeast Alliance and American's strategy with respect to New York and Boston. However, American moves to redact from this presentation the most sensitive portions that reveal granular and competitively sensitive financial data including yield and profitability data broken out by types of routes that inform how American makes future capacity decisions, revenue data specific to American's partnerships and highly sensitive future strategy and network plans, including detailed analyses of network plans by airport, and future plans with respect to existing or potential partnerships.	As explained in Section II.A. and II.C. of the Motion, disclosure of competitively sensitive business information regarding American's future plans and granular financial data will harm American's competitive standing.	High-level; Publicly available. This is email from August 2021. Defendants proposed redactions relate to material drawn from public sources and high-level plans.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0372	AA-NEA-03110008	AA-NEA-03110071	Series of text messages exchange between Chad Schweinzger, Anmol Bhargava, and Jordan Pack from May 2020	American moves to redact personal phone numbers, competitively sensitive business information regarding inputs to and outputs from American's proprietary Raven tool and financial data regarding revenue at certain airports.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing. Additionally, as explained in section I.A of the Motion, personal phone numbers should be sealed for privacy interests.	Core to the NEA; Employee discourse. This is a text exchange between American employees evaluating the NEA benefits in May 2020. Redactions relate to key calculations of revenue expected from NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0373	AA-NEA-03110025	AA-NEA-03110071	Series of text messages between Jordan Pack and Anmol Bhargava from May 2020	American moves to redact personal phone numbers, competitively sensitive business information regarding inputs to and outputs from American's proprietary Raven tool and financial data regarding revenue at certain airports.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing. Additionally, as explained in section I.A of the Motion, personal phone numbers should be sealed for privacy interests.	Core to the NEA; Employee discourse. This is a text exchange between American employees evaluating the NEA benefits in May 2020. Redactions relate to key calculations of revenue expected from NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0375	AA-NEA-03112790	AA-NEA-03112908	Series of text messages between Chad Schweinzger, Jordan Pack, and Anmol Bhargava from May 2020	American moves to redact personal phone numbers, competitively sensitive business information regarding the functioning of American's proprietary Raven tool.	As explained in Section II.E of the Motion, disclosure of information related to proprietary forecasting tools will harm American's competitive standing. Additionally, as explained in section I.A of the Motion, personal phone numbers should be sealed for privacy interests.	Core to the NEA; Employee discourse. This is a text exchange between American employees evaluating the NEA benefits in May 2020. Redactions relate to key calculations of revenue expected from NEA. Plaintiffs do not oppose redacting phone numbers, other personal identification information, or specific airports or routes for plans that have not been announced or implemented, but do oppose Defendants' other redactions.
PX0402	B6-UADL-00000182		Transcript of the Videotaped Deposition of Scott Laurence, In Re Civil Investigative Demand: United Airlines - Delta Air Lines Slot Transaction from October 2015	JetBlue moves to redact confidential and proprietary tools and methods that JetBlue employs in making strategic business decisions. JetBlue does not move to seal historic business and market information.	As explained in Section II.E of the motion, disclosure of proprietary tools used to make strategic decisions will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. Defendants have not articulated to Plaintiffs any basis for sealing or redacting this 2015 transcript.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0444	DOJ-NEA-00001416	DOJ-NEA-00001695	Transcript of the Videotaped Deposition of Scott Laurence in the matter of United States of America et al v. US Airways Group, Inc. and AMR Corporation (Case No. 1:13-cv-01236) dated October 18, 2013	JetBlue moves to redact confidential and proprietary tools and methods that JetBlue employs in making strategic business decisions. JetBlue does not move to seal historic business and market information.	As explained in Section II.E of the motion, disclosure of proprietary tools used to make strategic decisions will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. Defendants have not articulated to Plaintiffs any basis for sealing or redacting this 2013 transcript.
PX0445	DOJ-NEA-00001696	DOJ-NEA-00001934	Transcript of the Videotaped Deposition of Scott Laurence in the matter of United States of America v. United Continental Holdings, Inc. and Delta Airlines, Inc. (Case No. 2:15-cv-07992) dated March 31, 2016	JetBlue moves to redact confidential and proprietary tools and methods that JetBlue employs in making strategic business decisions and corporate strategy. JetBlue does not move to seal historic business and market information.	As explained in Section II.A. of the motion, disclosure of corporate strategy will harm JetBlue's competitive standing. As explained in Section II.E of the motion, disclosure of proprietary tools used to make strategic decisions will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. Defendants have not articulated to Plaintiffs any basis for sealing or redacting this 2016 transcript.
PX0468	DOJ-NEA-00002629	DOJ-NEA-00002642	August 14, 2020 JetBlue letter to UK Competition & Markets Authority regarding JetBlue's comments in response to proposal to issue an interim measures decision expending JetBlue's current terms of Slot Release Agreements.	JetBlue moves to seal this exhibit in its entirety. This letter relates to JetBlue's growth strategy in the UK market, including non-stale competitively sensitive information regarding JetBlue's network growth strategy and fleet planning for the UK market.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. It has been publicly announced that JetBlue was not awarded remedy slots at London Heathrow, and that JetBlue has entered service to London. This document is from March 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0469	DOJ-NEA-00002643	DOJ-NEA-00002648	August 14, 2020 JetBlue letter to UK Competition & Markets Authority regarding JetBlue's comments in response to proposal to issue an interim measures decision expending JetBlue's current terms of Slot Release Agreements.	JetBlue moves to seal this exhibit in its entirety. This letter relates to JetBlue's growth strategy in the UK market, including non-stale competitively sensitive information regarding JetBlue's network growth strategy and fleet planning for the UK market.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. It has been publicly announced that JetBlue was not awarded remedy slots at London Heathrow. JetBlue has entered service to London. This document is from August 2020.
PX0470	DOJ-NEA-00002649	DOJ-NEA-00002709	June 3, 2020 JetBlue letter to UK Competition & Markets Authority regarding JetBlue's comments in response to notice of Intention to Accept Binding Commitments Offered by International Consolidated Airlines Group and American Airlines in relation to the Atlantic Joint Business Agreement.	JetBlue moves to seal this exhibit in its entirety. This letter relates to JetBlue's growth strategy in the UK market, including non-stale competitively sensitive information regarding JetBlue's network growth strategy and fleet planning for the UK market, as well as related profitability information.	As explained in Section II.A. of the motion, disclosure of future network plans will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. It has been publicly announced that JetBlue was not awarded remedy slots at London Heathrow. JetBlue has entered service to London. This document is from June 2020.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0484	JBLU000 03876	JBLU000 03891	August 2019 presentation on initiatives related to a specific project launched in response to a competitor's growth in Boston	JetBlue moves to seal this presentation in its entirety. This presentation relates to a project that was launched in response to one of JetBlue's competitors. This presentation contains detailed information about various strategic initiatives related to JetBlue's network, operations, infrastructure, marketing, corporate sales, revenue management, technology that are relevant today.	As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.	High-level; Historic; Publicly available. This deck (from August 2019) discusses routes that have since been announced or entered. A similar version (PX0508) contains lesser redactions.
PX0508	JBLU000 48360	JBLU000 48364	Email thread between Chantal Van Wijnbergen, Andrea Lusso, Dave Clark, Andrew Parker, Robbie Mehoke, Scott Laurence, Elizabeth Windram, Jack Massey, Joanna Geraghty, and Robin Hayes from January 2020 re: BOS-NYC hourly (from Robin); contains one attachment titled "2001 Revere Shuttle.pptx"	JetBlue moves to redact limited information outlining commercial objectives and strategies related to a specific project that was launched in response to one of JetBlue's competitors. JetBlue does not seek to redact any plans that have already been implemented and made public.	As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public strategic planning documents, including those relating to initiatives in response to a particular competitor, will harm JetBlue's competitive standing.	High-level; Historic; Publicly available. These materials are from January 2020. They discuss routes that have since been announced or entered.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0538	JBLU002 50498	JBLU002 50517	Email from Dave Clark to Joanna Geraghty, Scott Laurence, Andrew Parker, Andrea Lusso, Evan Jarashow, Jeremy Blechman, BlueInventory&Fares Leadership, Nicholas Alemann, Richard Johns, and Nicholas Han from January 2020 re: Ben Baldanza Meeting Agenda and slides; contains one attachment titled "Ben Meeting v8.pptx"	JetBlue moves to redact portions of the attachment, which contains information regarding JetBlue's proprietary pricing and inventory tools, processes and strategies.	As explained in Section II.B and II.E of the motion, disclosure of highly sensitive, non-public pricing strategy and proprietary tools will harm JetBlue's competitive standing.	High-level; Historic. This deck, from January 2020, describes airline industry pricing.
PX0545	JBLU003 74628	JBLU003 74637	Email from JetBlue Sales Team to Dave Clark from April 2020 attaching corporate discount agreement with a corporate customer	JetBlue moves to redact the customer name and discount/prcing terms from the attachment to the exhibit, which is a corporate discount agreement between JetBlue and one of its corporate customers.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This is a corporate customer contract for air travel from April 2020. It relates to anticipated testimony in this case. Plaintiffs do not object to redacting customer names, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0546	JBLU003 79952	JBLU003 79963	Email from JetBlue Sales Team to Dave Clark from September 2019 attaching corporate discount agreement with a corporate customer	JetBlue moves to redact the customer name and discount/prcing terms from the attachment to the exhibit, which is a corporate discount agreement between JetBlue and one of its corporate customers.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This is a corporate customer contract for air travel from September 2019. It relates to anticipated testimony in this case. Plaintiffs do not object to redacting customer names, but do oppose Defendants' other redactions.
PX0547	JBLU004 28778	JBLU004 28788	Email from JetBlue Sales Team to Dave Clark from October 31, 2019 attaching corporate discount agreement with a corporate customer	JetBlue moves to redact the customer name and discount/prcing terms from the attachment to the exhibit, which is a corporate discount agreement between JetBlue and one of its corporate customers.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This is a corporate customer contract for air travel from April 2020. It relates to anticipated testimony in this case. Plaintiffs do not object to redacting customer names, but do oppose Defendants' other redactions.
PX0575	JBLU008 88108	JBLU008 88109	November/December 2019 email thread between Robin Hayes and Tracy Lawlor regarding Project Exchange Updated; contains two attachments titled "Proj. Exchange_Dec 12 Board Read-out.pdf" and "ATT00001.htm"	JetBlue moves to seal this email thread regarding JetBlue's corporate strategy, including non-stale competitively sensitive information concerning a pending corporate transaction.	As explained in Section II.A. of the motion, disclosure of non-stale competitively sensitive corporate strategy will harm JetBlue's competitive standing.	Overredacted; Publicly available. This document relates to the Spirit transaction, which has since been publicly announced. Limited redactions of numbers would be sufficient. The document is from December 2019.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0575	JBLU008 88110	JBLU008 88151	December 12, 2019 JetBlue Presentation, "Board of Directors Meeting Project Exchange" regarding a potential acquisition.	JetBlue moves to seal this slide deck in its entirety that contains contain non-stale competitively sensitive information regarding JetBlue's corporate strategy and granular financial data concerning a pending corporate transaction.	As explained in Section II.A. of the motion, disclosure of competitively sensitive corporate strategy will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Overredacted; Publicly available. This document relates to the Spirit transaction, which has since been publicly announced. Limited redactions of numbers would be sufficient. The document is from December 2019.
PX0649	JBLU014 33527	JBLU014 33530	Email thread between Barry McMenamin and corporate customer from August - September 2019 re: JetBlue checking in	JetBlue moves to redact the promotional terms that were offered to a prospective customer and the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document describes a promotion for a corporate customer from August 2019. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0650	JBLU014 35648	JBLU014 35652	Email thread between Tom Lloyd, Barry McMenamin, "Sys Ops Directors" list serv, Roberta Mehoke, Dave Clark, and corporate customer from April 2019 re: [Corporate Customer]: VVVIP - Chairman / CEO - Wednesday, April 17 - Philadelphia to Boston - Flight #2460	JetBlue moves to redact the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. This document relates to a route that a corporate customer flew in April 2019. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0653	JBLU014 50286	JBLU014 50289	Email thread between Barry McMenamin and corporate customers from December 2019 regarding promotional terms offered	JetBlue moves to redact the promotional terms that were offered to a customer, the corporate customer name, and personal information related to the customer's frequent flyer account.	As explained in Section II.D. of the Motion, disclosure of customer lists, pricing and discount information will harm JetBlue's competitive standing. Additionally, as explained in Section I, protection of privacy should be weighed against the presumption of access.	Historic; Overredacted; Pre-NEA competition. This document relates to a promotion for corporate customer from December 2019. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0658	JBLU014 61210	JBLU014 61213	Email thread between Barry McMenamin, Robbie Mehoke, Gregory Royall and corporate customers from September 2018 regarding negotiations around corporate discount agreement	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document includes description of pre-NEA competition and offer for corporate customer from September 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0659	JBLU014 66018	JBLU014 66020	Email thread between Robbie Mehoke and Barry McMenamin from January 2020 regarding renewal of corporate discount agreement with corporate customer	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for a corporate customer from January 2020. Language in the email reflects pre-NEA competition between American and JetBlue. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0660	JBLU014 70513	JBLU014 70521	Email thread between Barry McMenamin and corporate customers from February - April 2019 regarding updated corporate discount agreement	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for a corporate customer from February 2019. Language in the email reflects pre-NEA competition between American and JetBlue. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0662	JBLU014 81040	JBLU014 81041	Email thread between Barry McMenamin and Robbie Mehoke from February 2018 regarding renewal of corporate discount agreement with corporate customer	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Language in the email reflects pre-NEA competition between American and JetBlue. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0663	JBLU014 84552	JBLU014 84557	Email thread between Robbie Mehoke, Barry McMenamin, and Jeremy Blechman from January 2020 re renewal of corporate discount agreement with corporate customer	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0665	JBLU014 99803	JBLU014 99807	Email thread between Diane Zaiter, Robbie Mehoke, Evan Jarashow, Michael Hillyard, Aamir Patel from May - June 2018 re: [Corporate Customer] Mint Fares	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from June 2018. Language in the email reflects pre-NEA competition between American and JetBlue. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0666	JBLU015 05527	JBLU015 05531	September 2019 JetBlue Presentation, "Shuttling to & from BOS Increased frequency and Free Same-Day Changes plan"	JetBlue moves to redact information regarding its business strategy and future plans in Boston. JetBlue does not move to seal historic information about performance in Boston or marketing plans.	As explained in Section II.A. of the motion, disclosure of corporate strategy and forward looking plans will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. This deck from September 2019 discussing routes that have since been announced or entered.
PX0667	JBLU015 13336	JBLU015 13336	Email thread between Robbie Mehoke, Michelle Perciak, and Gregory Royall from January 2018 regarding negotiations with corporate customer	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from January 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0668	JBLU015 17484	JBLU015 17527	Standalone JetBlue Airways slide deck from August 2020 titled "JetBlue Update: Robbie Mehoke, Sales Director"	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	High-level; Historic; Overredacted; Pre-NEA competition. This document relates to fare offers and high-level descriptions of JetBlue's products from August 2020. Plaintiffs do not object to redaction of name of travel agency, but do oppose Defendants' other redactions.
PX0678	JBLU017 72595	JBLU017 72596	Email thread between Robbie Mehoke, "BlueInventory Leadership," Daryll Newman, and Gregory Royall from February 2018 re: KPMG Revenue Management request; contains one attachment titled "FW: KPMG Amendment Review"	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0678	JBLU017 72597	JBLU017 72597	Email thread between Robbie Mehoke, "BlueInventory Leadership," Daryll Newman, and Gregory Royall from February 2018 regarding renewal of corporate discount agreement with corporate customer with attachments containing corporate analyses	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0678	JBLU017 72598	JBLU017 72599	Spreadsheet containing information related to market share goals and discount terms	JetBlue moves to seal this spreadsheet, which contains detailed information related to specific pricing and discount terms provided to a corporate customer.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0678	JBLU017 72600	JBLU017 72600	Spreadsheet containing information related to market share goals and discount terms	JetBlue moves to seal this spreadsheet, which contains detailed information related to specific pricing and discount terms provided to a corporate customer.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0678	JBLU017 72601	JBLU017 72614	February 2018 presentation prepared for corporate customer	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer as well as the corporate customer name.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0678	JBLU017 72615	JBLU017 72615	Spreadsheet containing information related to market share goals and discount terms	JetBlue moves to seal this spreadsheet, which contains detailed information related to specific pricing and discount terms provided to a corporate customer.	As explained in Section II.D. of the Motion, disclosure of customer lists and highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from February 2018. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0697	JBLU022 11531	JBLU022 11541	October 2017 Corporate Discount Agreement between JetBlue and a corporate customer.	JetBlue moves to redact from this corporate contract client names and specific pricing information. JetBlue does not move to seal the terms of the corporate customer contract.	As explained in Section II.D. of the motion, disclosure of corporate customer names and corporate pricing will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This is a corporate customer contract for air travel from June 2019. It relates to anticipated testimony in this case. Plaintiffs do not object to redacting customer names, but do oppose Defendants' other redactions.
PX0702	JBLU025 00953	JBLU025 00957	Series of text messages between Derek Klinka, Claire Roeschke, and David Fintzen from June 2020	JetBlue moves to seal this exhibit in its entirety for containing personal phone numbers and for containing competitively sensitive future plans.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.A. of the motion, disclosure of corporate strategy and forward looking plans will harm JetBlue's competitive standing.	Employee discourse; Historic; Overredacted. Text conversation from June 2020 about a coworker's projects related to transactions that have since been publicly disclosed.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0704	JBLU025 01613	JBLU025 01622	Series of text messages between David Fintzen and Derek Klinka from May 2020	JetBlue moves to seal this exhibit in its entirety for containing personal phone numbers and for containing competitively sensitive future plans.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.A. of the motion, disclosure of corporate strategy and forward looking plans will harm JetBlue's competitive standing.	Employee discourse; Historic; Overredacted. Text conversation from June 2020 about a coworker's projects related to transactions that have since been publicly disclosed.
PX0712	JBLU025 27337	JBLU025 27357	Series of text messages between Joanna Geraghty and Robin Hayes from June 2020	JetBlue moves to redact the phone number of the participants in the text messages, and to redact future network planning and business strategy. JetBlue does not move to seal historic information.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.A. of the motion, disclosure of network planning and forward looking plans will harm JetBlue's competitive standing.	Employee discourse; Historic; Publicly available. Text conversation from June 2020 referring to plans that have since been publicly announced.
PX0718	JBLU025 56093	JBLU025 56103	Series of text messages between David Neeleman and Robin Hayes from February 2018	JetBlue moves to redact certain non-public information about contemplated partnerships with other airlines.	As explained in Section II.A. of the Motion, highly sensitive, non-public information related to corporate strategy, including those involving potential transactions, will harm JetBlue's competitive standing.	Employee discourse; Historic. Text conversation from February 2018 with a non-employee.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0718	JBLU025 56097	JBLU025 56097	Series of text messages between David Neeleman and Robin Hayes from February 2018	JetBlue moves to redact certain non-public information about contemplated partnerships with other airlines.	As explained in Section II.A. of the Motion, highly sensitive, non-public information related to corporate strategy, including those involving potential transactions, will harm JetBlue's competitive standing.	Employee discourse; Historic. Text conversation from February 2018 with a non-employee.
PX0718	JBLU025 56098	JBLU025 56098	Series of text messages between David Neeleman and Robin Hayes from February 2018	JetBlue moves to redact certain non-public information about contemplated partnerships with other airlines.	As explained in Section II.A. of the Motion, highly sensitive, non-public information related to corporate strategy, including those involving potential transactions, will harm JetBlue's competitive standing.	Employee discourse; Historic. Text conversation from February 2018 with a non-employee.
PX0721	JBLU025 98842	JBLU025 98859	June 11, 2020 JetBlue Presentation, "Project Connie Exec Read-Out Draft"	JetBlue moves to redact from this presentation future network planning and related granular financial data on margins. JetBlue does not move to seal general discussions of historic performance and the Northeast Alliance.	As explained in Section II.A. of the motion, disclosure of future strategic plans will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of future granular financial data will harm JetBlue's competitive standing.	Core to the NEA; Publicly available. June 2020 presentation on the Northeast Alliance with some redactions covering plans that have already been implemented. Plaintiffs' position is that only plans that have not yet been announced should be redacted.
PX0738	JBLU026 27526	JBLU026 27530	Series of text messages between Michael Quiello and Scott Laurence from June 2020	JetBlue moves to redact the phone numbers of the participants in the text messages. JetBlue does not move to seal the conversation.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy.	

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0739	JBLU026 27810	JBLU026 27837	Series of text messages between Scott Laurence and Robin Hayes from April 2020	JetBlue moves to redact the phone number of the participants in the text messages, and to redact future network planning and business strategy of how to negotiate with American. JetBlue does not move to seal historic market information.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.A. of the motion, disclosure of network planning and negotiating strategy will harm JetBlue's competitive standing.	Employee discourse; Historic. Text conversation from April 2020 regarding plans that did not come to fruition.
PX0740	JBLU026 27823	JBLU026 27837	Series of text messages between Robin Hayes and Scott Laurence from April 2020	JetBlue moves to seal this exhibit in its entirety because it contains the phone number of the participants in the text messages, and to redact future network planning and business strategy of how to negotiate with American.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.A. of the motion, disclosure of network planning and negotiating strategy will harm JetBlue's competitive standing.	Employee discourse; Historic. Text conversation from April 2020 regarding plans that did not come to fruition. Plaintiffs do not oppose redacting airport codes and phone numbers, but do oppose Defendants' other redactions.
PX0754	JBLU027 27455	JBLU027 27457	JetBlue handwritten notes from a February 13, 2020 board meeting related to fleet safety, audits, and compensation related to a pending corporate transaction.	JetBlue moves to seal this exhibit in its entirety because it details JetBlue's corporate strategy and network planning.	As explained in Section II.A. of the motion, disclosure of corporate strategy and network planning will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. This document contains information regarding pre-NEA competition. Defendants propose sealing this in its entirety and have not offered proposed redactions, despite Plaintiffs' requests.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0763	JBLU-LIT-00025049	JBLU-LIT-00025051	March 18, 2021 JetBlue email thread between Dave Clark, Kimberly Parker, Jonathan Weiner, Evan Jarashow, BlueInventory&Fares Leadership, and Ryan Metzger from re: GSA FY 22 Bid Summary	JetBlue moves to redact from this email thread non-stale competitively sensitive information regarding JetBlue's pricing and bidding strategy. JetBlue does not move to seal general information about the bid.	As explained in Section II.B. of the motion, disclosure of pricing strategy will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. This document relates to routes from Defendants' prior bids for government travel contracts. Plaintiffs do not object to redacting the fares, but do oppose Defendants' other redactions.
PX0801	JBLU-LIT-01552226	JBLU-LIT-01552259	July 2021 email thread between Reese Davidson, Todd Homan, Peter Irvine, Fahad Ahmad, Jason Horner, Albert Muldoon, Kevin Bryan, and Robert Land re: JetBlue Submissions to Mazars/CMA; contains one attachment titled "2021 07 22 PE decision S22 slots (NC version B6).pdf"	JetBlue moves to redact parts of the email thread in this exhibit that relate to JetBlue's corporate competitive strategy in the UK market. JetBlue also moves to seal the attachment to the email in this exhibit. The attachment titled "2020 11 13 (B6) inc mark up for applicant.pdf" contains commercially sensitive information regarding JetBlue's corporate competitive strategy in the UK market.	As explained in Section II.A. of the motion, disclosure of non-stale competitively sensitive corporate strategy information will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. It has been publicly announced that JetBlue was not awarded remedy slots at London Heathrow, and that JetBlue has entered service to London. This document is from July 2021.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0805	JBLU-LIT-01561435	JBLU-LIT-01561463	November 2020 mail thread between James Lambert, Robert Land, Ronan Flanagan, Liam Maclean, Michael Jewell, Colin Garland, Claire Corbett, April Carr, ProjectTaurus-External, and Reese Davidson from re: CMA London-Boston slot, contains one attachment titled "2020 11 13 (B6) inc mark up for applicant.pdf"	JetBlue moves to seal the attachment to the email in this exhibit. The attachment titled "2020 11 13 (B6) inc mark up for applicant.pdf" contains commercially sensitive information regarding JetBlue's corporate competitive strategy in the UK market.	As explained in Section II.A. of the motion, disclosure of non-stale competitively sensitive corporate strategy information will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. It has been publicly announced that JetBlue was not awarded remedy slots at London Heathrow, and that JetBlue has entered service to London. This document is from November 2020.
PX0807	JBLU-LIT-01566947	JBLU-LIT-01566961	June 19, 2020 JetBlue presentation, "Board of Directors - June Meeting - Emerging from the Crisis - v10 (Connie)"	JetBlue moves to redact from the presentation business strategy and planning information. JetBlue does not move to seal historic market information.	As explained in Section II.A. of the motion, disclosure of corporate strategy will harm JetBlue's competitive standing.	Core to the NEA; High-level; Overredacted. These are decks created during NEA negotiations presented to the JetBlue board and executives, containing high-level descriptions of the NEA, and subsequently shared with the UK Competition and Markets Authority.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0813	JBLU-LIT-01767343	JBLU-LIT-01767370	Email from Dave Clark to Joi Dolvin-Plummer from September 2021 re: Print 4 color copies please; contains one attachment titled "RM and Network slides for Monte Ford vFinal.pdf"	JetBlue moves to redact portions of the attachment, which contains information regarding JetBlue's proprietary pricing and inventory tools, processes and strategies.	As explained in Section II.B and II.E of the motion, disclosure of highly sensitive, non-public pricing strategy and proprietary tools will harm JetBlue's competitive standing.	High-level; Historic. This document provides a high-level overview of revenue management and network planning for a newly added Board of Directors member. It contains organizational charts, a history of changes to industry fare options since 2008, and basic information about airline pricing and route schedules. Plaintiffs do not object to redacting specific forecast numbers or current non-public pricing strategies, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0814	JBLU-LIT-01767974	JBLU-LIT-01768113	June 2021 Competitive Assessment Primer prepared by JetBlue, "Competitive Primer"	JetBlue moves to redact from this 2021 presentation corporate strategy and future planning information regarding expanding offered services. JetBlue further moves to redact granular financial information. JetBlue does not move to seal historic or current market information.	As explained in Section II.A. of the motion, disclosure of forward-looking plans and corporate strategy will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial information will harm JetBlue's competitive standing.	High-level; Historic; Overredacted. This email thread from June 2021 and its attachments provide an airline industry overview. Defendants' redactions cover high-level, historic descriptions of JetBlue's performance (e.g., in 2021 in NEA airports, handling of costs during the beginning of the pandemic in 2020), and high-level strategies such as tapping into the vacation-home rental market or improving personalization for customers.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0814	JBLU-LIT-01767974	JBLU-LIT-01768113	June 2021 Competitive Assessment Primer prepared by JetBlue, "Competitive Primer"	JetBlue moves to redact from this 2021 presentation corporate strategy and future planning information regarding expanding offered services. JetBlue further moves to redact granular financial information. JetBlue does not move to seal historic or current market information.	As explained in Section II.A. of the motion, disclosure of forward-looking plans and corporate strategy will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial information will harm JetBlue's competitive standing.	High-level; Historic; Overredacted. This email thread from June 2021 and its attachments provide an airline industry overview. Defendants' redactions cover high-level, historic descriptions of JetBlue's performance (e.g., in 2021 in NEA airports, handling of costs during the beginning of the pandemic in 2020), and high-level strategies such as tapping into the vacation-home rental market or improving personalization for customers.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0818	JBLU-LIT-01790297	JBLU-LIT-01790303	November 2021 email thread between Dave Clark, Robin Hayes, Joanna Geraghty, Ursula Hurley, Dimpy Singh, Scott Laurence, Santiago Martello, Pete Gianvecchio, Carol Clements, Maryssa Miller, Alex Chatkewitz, Andres Barry, Sara Bogdan, Richard Johns, Jonathan Weiner, Robbie Mehoke, Sasha Barker, Jose Calado, Jayne O'Brien, and Don Uselmann from November 2021 re: 2022 Revenue Initiative Options (Recommendations); contains one attachment titled "Potential 2022 Revenue Initiatives vFinal.xlsx"	JetBlue moves to redact parts of the email thread in this exhibit that relate to non-stale strategic discussions about revenue initiatives. JetBlue also moves to seal the attachment to the email thread in this exhibit. The exhibit contains commercially sensitive information regarding revenue strategy, as well as granular revenue data.	As explained in Section II.A. of the motion, disclosure of prospective business plans will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Historic; Publicly available. This document from November 2021 includes plans that have since been publicly announced or implemented.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0820	JBLU-LIT-01905282	JBLU-LIT-01905283	October 22, 201 JetBlue email from Andrew Uzenoff to Eric Friedman and Jack Massey from October 2021 re: NEA materials for next week; contains three attachments titled "RE: LGA Frequencies," "JFK Connectivity Summer 2022_B6 edits.xlsx," and "Copy of NEA Steady State Plan - October 2021 Meeting.xlsx"	JetBlue moves to redact future network planning. JetBlue does not move to seal remaining discussions related to historic and current market information about JFK and LGA.	As explained in Section II.A. of the motion, disclosure of future network planning will harm JetBlue's competitive standing.	Core to the NEA; Historic. This document describes summer 2022 frequencies under the NEA, which will be publicly available by the time of trial, including the fact that American no longer offers service between Boston and La Guardia.
PX0822	JBLU-LIT-02113531	JBLU-LIT-02113591	Email thread between Jonathan Weiner, Blue Inventory & Fares Leadership, Dave Clark, Scott Laurence, Andrea Lusso, and Richard Johns from September 2021 re: FW: Monte Ford Slides; contains two attachments titled, "RM and Network slides for Monte Ford v.8.pdf" and "RM and Network slides for Monte Ford v.8.pptx"	JetBlue moves to redact portions of the attachment, which contains information regarding JetBlue's proprietary pricing and inventory tools, processes and strategies.	As explained in Section II.B and II.E of the motion, disclosure of highly sensitive, non-public pricing strategy and proprietary tools will harm JetBlue's competitive standing.	High-level; Historic. This document includes revenue strategies up through 2021, which are no longer competitively sensitive.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0838	JBLU-LIT-02768723	JBLU-LIT-02768857	JetBlue's September 2021 Senior Leadership Team Strategy Offsite presentation regarding Strategy and Business Development"	JetBlue moves to redact parts of the presentation that relate to competitively sensitive future network planning and corporate strategy, as well as granular financial data.	As explained in Section II.A. of the motion, disclosure of future network plans and corporate strategy will harm JetBlue's competitive standing. As explained in Section II.C of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	High-level; Historic; Overredacted. Redactions cover high-level strategies for 2021 (which have now been implemented), general statements about long-term metrics, description of JetBlue's past growth performance, and past travel products dating back to 2017.
PX0839	JBLU-LIT-02770232	JBLU-LIT-02770371	June 2021 Competitive Assessment Primer prepared by JetBlue, "Evolution to a Travel Company"	JetBlue moves to redact from this 2021 presentation corporate strategy and future planning information regarding expanding offered services. JetBlue further moves to redact granular financial information. JetBlue does not move to seal historic or current market information.	As explained in Section II.A. of the motion, disclosure of forward-looking plans and corporate strategy will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial information will harm JetBlue's competitive standing.	High-level; Historic; Overredacted. This email thread from September 2021 and its attachments provide an airline industry overview. Defendants' redactions cover high-level, historic descriptions of JetBlue's performance (e.g., in 2021 in NEA airports, handling of costs during the beginning of the pandemic in 2020), and high-level strategies such as tapping into the vacation-home rental market or improving personalization for customers.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0842	JBLU-LIT-03005559	JBLU-LIT-03193911	Series of text messages between Eric Friedman and Jack Massey from September 2020	JetBlue moves to redact future network planning and business strategy. JetBlue does not move to seal historic or current market information.	As explained in Section II.A. of the motion, disclosure of future network and business plans will harm JetBlue's competitive standing.	Employee discourse; High-level; Historic; Publicly available. This document discusses public-facing trends in the airline industry between 2015 and 2020. The conversation is from September 2020.
PX0846	JBLU-LIT-03242122	JBLU-LIT-03242131	Series of text messages between Scott Laurence and Warren Christie from August 2021	JetBlue moves to redact the phone numbers of the participants in the text messages, and business strategy with respect to transatlantic service. JetBlue does not move to seal other business conversations.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.A. of the motion, disclosure of corporate strategy will harm JetBlue's competitive standing.	Core to the NEA; Employee Discourse. This document from August 2021 includes information about the terms and strategy of the NEA. Plaintiffs do not object to redacting phone numbers, but do oppose Defendants' other redactions.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0862	JBLU-LIT-03617462	JBLU-LIT-03617477	NEA Corporate Go-to-Market Proposal, dated April 15, 2021	American moves to redact from this exhibit, a deck used to present American's ideas about the strategies and tactics to compete for customers in the Northeast Alliance, specific information about how American is targeting corporate customers.	As explained in Section II.A., disclosure of information regarding American's strategy in targeting specific customers as part of the Northeast Alliance will allow competitors to anticipate and target those same customers using the other competitively sensitive information about the NEA offerings that have not been redacted from this presentation and other documents to gain an advantage.	Core to the NEA. This document from April 2021 describes the structure of the NEA. It is central to the topic of this litigation.
PX0866	JBLU-LIT-03734347	JBLU-LIT-03735909	Series of text messages between Eric Friedman and Eric Tanner from September 2020	JetBlue moves to redact future funding and network information. JetBlue does not move to seal historic or current market information.	As explained in Section II.A, of the motion, disclosure of future plans will harm JetBlue's competitive standing.	Core to the NEA; Employee discourse; Overredacted; Publicly available. This document from July 2021 includes discussion of network decisions related to the NEA, some of which have been publicly announced or disclosed.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0899	SSBT_0000206	SSBT_0000225	Email thread between Barry McMenamin and Dorothy Nee from March - May 2019 re: Renewal Update - New agreement and summary presentation; contains two attachments titled "State Street Corporation Corporate MSA April 1, 2019.pdf" and "State Street FF presentation.pdf"	JetBlue moves to redact information related to specific pricing and discount terms provided to a corporate customer.	As explained in Section II.D. of the Motion, disclosure of highly sensitive, non-public pricing and discount information will harm JetBlue's competitive standing.	Historic; Overredacted; Pre-NEA competition. This document relates to fare offers for corporate customer from May 2019. Plaintiffs do not object to redaction of name of corporate customer, but do oppose Defendants' other redactions.
PX0918	AA-NEA-01396637	AA-NEA-01396660	Standalone American slide deck from May 2020 titled "Garland Relationship Options & Proposals" with file name "Garland - INTL Review - 04May - Internal.pptx"	American moves to redact from this presentation regarding the Northeast Alliance routes identified as potential new international routes that American has not announced or launched and detailed financial information for American and JetBlue that is not public and competitively sensitive.	As explained in Sections II.A. and II.C. of the Motion, disclosure of future plans and granular financial data will harm American's competitive standing.	Core to the NEA; Overredacted. This document reflects Defendants' descriptions of the NEA from May 2020. Such descriptions are central to this litigation.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0919	AA-NEA-01399291		Standalone Excel document from April 2020; contains nine tabs titled, "Rainbow Rev," "Rainbow Pax," "OD Rev Chg AA Dom Op," "OD Rev Chg B6 Dom Op," "OD Rev Chg Mixed Metal," "Hub Summary," "Seg Data AA Op," "Seg Data B6 Op," and "Flow Over Leg AA BOSLHR"	American moves to seal this exhibit, which is an output of American's proprietary Raven model that details highly sensitive and granular revenue data associated with American, American's flights, and its partnerships reflected in a spreadsheet spanning more than 80 pages.	As explained in Section II.C. of the Motion, granular financial data if disclosed will harm American's competitive standing. Additionally, the output reveals highly competitively sensitive features of American's proprietary Raven model that should be sealed consistent with Section II.E. of the Motion.	Core to the NEA; Historic; Publicly available. This document from April 2020 reflects early-stage models of the NEA. This model is central to this litigation, and much of the information contained therein has been publicly disclosed or implemented.
PX0920	AA-NEA-01399305		Standalone Excel document from April 2020; contains eight tabs titled, "Rainbow Rev," "Rainbow Pax," "OD Rev Chg AA Dom Op," "OD Rev Chg B6 Dom Op," "OD Rev Chg Mixed Metal," "Hub Summary Rev," "Seg Data AA Op," and "Seg Data B6 Op"	American moves to seal this exhibit, which is an output of American's proprietary Raven model that details highly sensitive and granular revenue data associated with American, American's flights, and its partnerships reflected in a spreadsheet spanning more than 80 pages.	As explained in Section II.C. of the Motion, granular financial data if disclosed will harm American's competitive standing. Additionally, the output reveals highly competitively sensitive features of American's proprietary Raven model that should be sealed consistent with Section II.E. of the Motion.	Core to the NEA; Historic; Publicly available. This document from April 2020 reflects early-stage models of the NEA. This model is central to this litigation, and much of the information contained therein has been publicly disclosed or implemented.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0921	AA-NEA-01399308		Standalone Excel document from April 2020; contains eight tabs titled, "Rainbow Rev," "Rainbow Pax," "OD Rev Chg AA Dom Op," "OD Rev Chg B6 Dom Op," "OD Rev Chg Mixed Metal," "Hub Summary," "Seg Data AA Op," and "Seg Data B6 Op"	American moves to seal this exhibit, which is an output of American's proprietary Raven model that details highly sensitive and granular revenue data associated with American, American's flights, and its partnerships reflected in a spreadsheet spanning more than 80 pages.	As explained in Section II.C. of the Motion, granular financial data if disclosed will harm American's competitive standing. Additionally, the output reveals highly competitively sensitive features of American's proprietary Raven model that should be sealed consistent with Section II.E. of the Motion.	Core to the NEA; Historic; Publicly available. This document from April 2020 reflects early-stage models of the NEA. This model is central to this litigation, and much of the information contained therein has been publicly disclosed or implemented.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0925	AA-NEA-02143000	AA-NEA-02143113	Email from Neal Parikh to Vasu Raja, Massimo Mancini, Devon May, Nina Wittkamp, and Steffen Fuchs from July 2021 re: Network Strategy Update (pre-read); contains two attachments titled, "1. Executive Summaries Chapters 1-4 (July 23 PM).pdf" and "2. Pre-read Slides Chapter 1-4 (July 25th PM).pdf"	American moves to redact portions of this exhibit, which include Board decks from July 2021 spanning more than 100 pages that were used by the company to explain to the Board in detail American's future commercial strategy. Despite its sensitivity, American does not move to redact specific discussions of the Northeast Alliance and American's strategy with respect to New York and Boston. However, American moves to redact from these presentations the most sensitive portions that reveal granular and competitively sensitive financial data including yield and profitability data broken out by types of routes, revenue data specific to American's partnerships and highly sensitive and relatively recent future strategy and network plans, including detailed analysis of American's prospects in different airports and future plans with respect to existing or potential partnerships.	As explained in Section II.A. and II.C. of the Motion, disclosure of competitively sensitive business information regarding American's future plans and granular financial data will harm American's competitive standing.	Proposed redactions not received. Plaintiffs have not received revised redactions from Defendants and have been unable to review.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0935	JBLU006 27566	JBLU006 27567	January 25, 2019 JetBlue email thread between Nicholas Han, Tom Kuehn, Andrea Lusso, Erick Capps, Jack Massey, Eric Friedman, Chung-Chiang Kao, and Kevin Costello from January 2019 re: EWR growth outlook	JetBlue moves to redact from this email thread future network planning for Newark. JetBlue does not move to seal historic market information about Newark.	As explained in Section II.A. of the motion, disclosure of future network planning will harm JetBlue's competitive standing.	High-level; Historic. Plaintiffs have not received revised redactions from Defendants and have been unable to review; however, Defendants confirmed that they anticipate substantially similar redactions the proposed redactions for PX0314. PX0314 is an email from July 2021 related to high-level strategies and historical descriptions of markets, such as passenger breakdowns from 2019. Consistent with the approach for PX0314, Plaintiffs do not anticipate objecting to redactions of specific margin percentages, but do anticipate opposing Defendants' other redactions.

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PX0936	JBLU017 87894	JBLU017 87896	Email from Jack Massey to Ciprian Acatrinei, John Allen, Jesus Baez, Alex Battaglia, Eric Berger, Heather Berko, BluePlanning, Katherine Celli, Warren Christie, Dave Clark, Giselle Cortes, Kevin Costello, Ian Deason, Joseph DeVito, Joshua Dover, Hakan Ergan, Mandy Gargano, Joshua Goldwitz, Jeffrey Goodell, Kapil Gwalani, Thomas Howell, Rose Hsu, David Jehn, Loretta Kennedy, Tony LaCognata, Jeff Landgrebe, Scott Link, Andrew Matuson, Peter McManus, Ponnarasi Sakthivelu, Gisselle Sanchez, Adam Schless, Kelly Shannon, Keith Slotter, Mike Stine, Wallace Trolan, Jakob Van Leeuwen, Andy Parker, Maryssa Miller, Amit Chawla, Jeffery Hunt, Wendy Juengerkes, Santiago Martello, Michael Bocker, Lisa Reifer, Chantal Van Wijnbergen, Robert	JetBlue moves to redact future network planning information. JetBlue does not move to seal historic or current market information	As explained in Section II.A. of the motion, disclosure of future network planning will harm JetBlue's competitive standing.	Historic; Pre-NEA competition; Publicly available. This document reflects Defendants' network plans for 2019 to 2021. These flights have been flown or were abandoned.
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Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
			Martinelli, Caryl Spoden, Tim Massimiano, William Mercier, Reese Davidson, Matthew Urbanek, Jin Wang, Thomsa Connolly, Christopher McCloskey, Mariya Stoyanova, Andres Barry, Michael Pezzicola, Allison Silverstein, and Route Planning from September 2019 re: **CONFIDENTIAL* * Quarterly Network Development Update			
PX0938	JBLU025 00877	JBLU025 00917	Series of text messages between +19788463237, David Fintzen, and Claire Roeschke from May 2020	JetBlue moves to redact the phone numbers of the participants in the text messages and granular financial information. JetBlue does not move to redact historic or current market information.	As explained in Section I.A. of the motion, personal phone numbers should be redacted in the interest of privacy. As explained in Section II.C. of the motion, disclosure of granular financial data will harm JetBlue's competitive standing.	Core to the NEA; Employee discourse; High-level. This document includes a high-level description of a tool used to evaluate the NEA.

Appendix A (Exhibits To Be Sealed Objected To By Plaintiffs)

Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX0949	JBLU-LIT-04405031	JBLU-LIT-04405206	Standalone JetBlue slide deck titled "Board of Directors Meeting" from February 2022	JetBlue moves to redact from this board presentation granular financial data (including margins and profitability); future plans related to network, infrastructure, fleet plans; and draft board resolutions.	As explained in Section II.A and II.C, disclosure of detailed and granular financial data related to margins and profitability as well as highly sensitive, strategic planning documents, including those involving future plans, will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. This document addresses projects that have since been publicly disclosed. The document also includes high-level plans and backward-looking anecdotes.
PX0949	JBLU-LIT-04405031	JBLU-LIT-04405206	February 2022 JetBlue Presentation, "Board of Directors Meeting"	JetBlue moves to redact from this 2022 presentation future business planning and strategy, future network planning, future fleet planning, and granular financial information. JetBlue does not move to seal historic and current market information.	As explained in Section II.A. of the motion, disclosure of forward-looking plans and corporate strategy will harm JetBlue's competitive standing. As explained in Section II.C. of the motion, disclosure of granular financial information will harm JetBlue's competitive standing.	Historic; Overredacted; Publicly available. This document addresses projects that have since been publicly disclosed. The document also includes high-level plans and backward-looking anecdotes.
PX1006			Exhibit 2 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized frequent flyer ticket data from 2019.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX1007			Exhibit 3 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
PX1008			Exhibit 4 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a table indicating where American and JetBlue customers reside.	This table provides competitors an understanding of where marketing could be targeted to capture more of American and JetBlue customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue and American ticket data from 2019.
PX1009			Exhibit 5 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX1010			Exhibit 6 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
PX1011			Exhibit 7 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a table indicating where American and JetBlue customers reside.	This table provides competitors an understanding of where marketing could be targeted to capture more of American and JetBlue customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue and American ticket data from 2019.
PX1013			Exhibit 9 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX1014			Exhibit 10 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
PX1015			Exhibit 11 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a table indicating where American and JetBlue customers reside.	This table provides competitors an understanding of where marketing could be targeted to capture more of American and JetBlue customers. Thus, disclosure will harm Defendants' competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
PX1016			Exhibit 12 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. This exhibit is a map of where Jetblue's customers reside created using JetBlue's ticket sales data from the JetBlue slide deck "New York & Washington DC Slot Acquisition Plan," dated January 2012	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized ticket data from 2012.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX1024			Exhibit 20 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. This exhibit is a table showing granular financial information concerning JetBlue's corporate strategy in certain domestic markets.	As explained in Section II.A. of the motion, disclosure of highly sensitive, non-public information concerning JetBlue's corporate strategy will harm JetBlue's competitive standing.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized data.
PX1037			Exhibit 33 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
PX1038			Exhibit 34 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX1039			Exhibit 35 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.
PX1040			Exhibit 36 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.
PX1041			Exhibit 37 of N. Miller Expert Report (June 9, 2022)	American moves to seal this exhibit. The exhibit is a map of where American's customers reside created using American's frequent flier ticket data.	This map provides competitors an understanding of where marketing could be targeted to capture more of American's customers. Thus, disclosure will harm American's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized American ticket data from 2019.

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Exhibit Number	Starting Bates	Ending Bates	Description	Defendants' Motion To Seal	Defendants' Basis For Motion To Seal	Plaintiffs' Objection
PX1042			Exhibit 38 of N. Miller Expert Report (June 9, 2022)	JetBlue moves to seal this exhibit. The exhibit is a map of where JetBlue's customers reside created using JetBlue's ticket sales data.	This map provides competitors an understanding of where marketing could be targeted to capture more of JetBlue's customers. Thus, disclosure will harm JetBlue's competitive standing as explained in Section II of the Motion.	Core to the NEA; High-level; Historic. This document reflects expert, theoretical, empirical analysis of aggregated and anonymized JetBlue ticket data from 2019.